UNITED STATES DISTRICT COURT OF THE SOUTHERN DISTRICT OF NEW YORK

PANGANG GROUP INTERNATIONAL ECONOMIC & TRADING CO., LTD and PANGANG GROUP CHONGQING TITANIUM INDUSTRY CO., LTD.,

Case No. 15-cv-9586

Petitioners,

-against-

PETRO-CHEM DEVELOPMENT CO., INC.

Respondent.

NOTICE OF PETITION TO CONFIRM AN ARBITRATION AWARD

PLEASE TAKE NOTICE that upon on the annexed Petition of Pangang Group
International Economic & Trading Co., Ltd. and Pangang Group Chongqing Titanium Industry
Co., Ltd. (together the "Petitioners") to Confirm an Arbitration Award (the "Petition");
Petitioners' Memorandum in Support of Petition; and the Declaration of Carl W. Oberdier,
sworn to December 7, 2015, and the exhibit attached thereto, Petitioners will petition this Court,
at the United States Courthouse, 500 Pearl Street, in the City, County, and State of New York,
before a judge of the United States District Court for the Southern District of New York, U.S.
Court House, 500 Pearl Street, New York, New York, at a time and place to be determined by
the Court, for an order, pursuant to the Convention on the Recognition and Enforcement of
Foreign Arbitral Awards (June 10 1958), as implemented by Chapter 2 of the Federal Arbitration
Act, 9 U.S.C. § 207 (a) confirming the Final Arbitration Award, dated December 12, 2014,
rendered by Sigvard Jarvin, JDr, Christopher Moger QC, and Alexander Foerster, President,
under the auspices of the International Chamber of Commerce, and entering judgment thereon;
and (b) any other relief that this Court deems necessary and proper in the interests of justice.

Dated: December 7, 2015 New York, New York OBERDIER RESSMEYER LLP

Carl W. Oberdier

Kellen G. Ressmeyer

655 Third Avenue

28th Floor

New York, New York 10017 Tel: (212) 659-5141

Fax: (646) 349-4925

Attorneys for Petitioners